

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO: 24-24228-cv-ALTONAGA**

MEGAN PETE, an individual

Plaintiff,

v.

MILAGRO ELIZABETH COOPER,
an individual,

Defendant.

**DEFENDANTS' UNOPPOSED MOTION FOR
ENLARGMENT OF TIME TO RESPOND TO COMPLAINT**

Defendant, MILAGRO ELIZABETH COOPER, through their undersigned counsel, pursuant to Rule 6, Fed.R.Civ.P., files this, her Unopposed Motion for Enlargement of Time to Respond to the Complaint and states as follows:

1. This is diversity action for damages and injunctive relief brought by Plaintiff under various common law torts and statutory claims arising out of online postings allegedly made by Defendant, an online blogger/journalist based out of Houston, Texas.
2. Defendant's response to Plaintiff's Complaint is due on November 21, 2024.
3. The undersigned counsel was just retained on November 19, 2024 in the instant matter and is currently investigating the issues and allegations raised in the Complaint.
4. Accordingly, Defendant respectfully requests an enlargement of time, up through and including December 21, 2024, within which to file her response to the Complaint.
5. Plaintiff's Complaint contains numerous factual allegations and novel claims under Florida law.

6. Additionally, there are jurisdictional and venue issues that may also need to be addressed by the Defendant in her response to the Complaint.

7. No party will be unfairly prejudiced by the requested enlargement of time.

8. Defendant will be unfairly prejudiced if this motion is denied as she will be denied the opportunity to timely prepare a thorough and cogent response to Plaintiff's Complaint.

9. Counsel for Plaintiff, Dan Humphrey, Esquire, has been contacted and has advised that he has no objection to the requested enlargement of time.

MEMORANDUM OF LAW

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, "the court for cause shown may at any time in its discretion . . . order the period enlarged if request therefore is made before the expiration of the period originally prescribed or as extended by a previous order." Fed.R.Civ.P. Defendant's Motion clearly sets forth a good faith basis for granting this enlargement. Defendant is not engaging in any type of delay tactic that would warrant denial of this Motion. Defendant respectfully requests that the Court exercise its discretion and permit the requested enlargement for the good cause stated herein.

WHEREFORE, Defendant, MILAGRO ELIZABETH COOPER, respectfully requests an enlargement of time, up through and including December 21, 2024 within which to file her response to the Complaint.

Dated: November 20, 2024

Respectfully submitted,

PancierLaw

COUNSEL FOR DEFENDANT

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/s/ Michael A. Pancier, Esq.

Michael A. Pancier, Esq.

Fla. Bar No. 958484

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on November 20, 2024, I electronically filed the foregoing document with the Clerk of the Court using CM/ ECF. I also certify that the foregoing document is being served on this day on all counsel of record or pro se parties identified on the attached Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

/s/ Michael A. Pancier, Esq.

Michael A. Pancier, Esq.

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